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Counsel for Defendant  
Peter Townsley

**United States District Court**  
**Northern District of California**

UNITED STATES OF AMERICA

Plaintiff,

vs.

PETER TOWNSLEY,

Defendant.

No. CR 10-0428 CRB

STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE BOND  
HEARING FROM NOVEMBER 19,  
2010 TO DECEMBER 17, 2010

Peter Townsley, through his counsel of record, and the United States, through its counsel of record, stipulate to the following:

1. In an order filed October 20, 2010, this Court (Magistrate Judge Joseph Spero), directed that, in addition to the other conditions of release, \$300,000 of the equity in property in Gonzalez, California be posted to secure the bond by November 19, 2010. See, "Amended Order Re Bond And Terms And Conditions Of Release," Docket No. 10, p. 2, par. 4.

2. The Court further ordered the parties to appear on November 19, 2010 at 10:30 a.m., "for status regarding the posting of the property." *Id.*, Docket No. 10, p. 3.

1       3. Counsel for Mr. Townsley has provided the government with proof that a  
2       lien against the property in Gonzalez, California in the amount of \$300,000 in  
3       favor of the Clerk of the Court, Northern District of California was recorded on  
4       November 10, 2010, and a current title report. Counsel for Mr. Townsley has also  
5       provided the government with documentation of the tax assessed value of the  
6       property, which reflects more than sufficient equity to satisfy the bond.

7       4. Prior to approving the bond, the government has requested a current  
8       appraisal of the property. Mr. Townsley has contracted for a commercial  
9       appraisal to be done on the property, and has provided the government with a  
10      copy of the contract for the appraisal.

11      5. The appraisal has not been completed, and it will not be completed by  
12      November 19, 2010.

13      6. In light of the posting of the property, and the ongoing good faith efforts  
14      to provide the government with the additional information it has requested  
15      before approving the bond, the parties jointly request that the Court continue the  
16      hearing on the status regarding the posting of the property that is currently  
17      scheduled for November 19, 2010, at 10:30 a.m., to December 17, 2010, at 10:30  
18      a.m.

19  
20      As counsel for Peter Townsley, I stipulate to paragraphs 1-6, *supra*.

21      Dated: November 17, 2010                      Signed: /s/ William J. Genego

22  
23      As counsel for the United States, I stipulate to paragraphs 1-6, *supra*.

24                                      Melinda Haag, United States Attorney

25      Dated: November 17, 2010                      By: /s/ Susan E. Badger  
26    Assistant U.S. Attorney

1 The Court approves the stipulation and hereby ORDERS that:

2 The hearing on the status regarding the posting of the property that is  
3 currently scheduled for November 19, 2010, at 10:30 a.m., is continued to  
4 December 17, 2010, at 10:30 a.m.

5 IT IS SO ORDERED.

6 Dated: 11/18/10

